

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON; and,
STATE OF OREGON,

Plaintiffs,

vs.

DONALD TRUMP, et. al.,

Defendants.

NO. 2:25-cv-00602-JHC

UNOPPOSED MOTION FOR LEAVE
TO FILE BRIEF OF AMICUS CURIAE
NATIONAL VOTE AT HOME
INSTITUTE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT

Noting Date: July 21, 2025

1 Proposed Amicus Curiae National Vote at Home Institute (“NVAHI”) moves for leave to
2 file an amicus brief in support of Plaintiffs’ Motion for Partial Summary Judgment (Dkt. 37).

3 In furtherance of the motion, NVAHI states as follows:

4 1. NVAHI is a non-partisan, non-profit organization which works to increase
5 voters' access to, use of, and confidence in mailed-out ballots throughout the United States.
6

7 2. NVAHI supports Plaintiffs because Section 7(a) of the Executive Order that is
8 a subject of Plaintiffs’ lawsuit would disenfranchise some voters who vote at home and return
9 their ballots by mail, through no fault of their own.

10 3. This Court "ha[s] broad discretion to admit amicus briefing [...] to assist a case
11 of general public interest." *Sec & Ech. Comm'n v. Bittrex Inc.*, No. 2:23-CV-00580-RSM, 2023
12 WL 4866373, at *1 (W.D. Wash. July 31, 2023) (granting leave to file where brief provides
13 "assistance in framing the facts and law of this case").
14

15 4. The proposed brief will assist the Court in its consideration of the pending
16 motion because it explains the benefits of voting at home and how voters who return ballots
17 by mail will be harmed by Section 7(a) of the EO.

18 5. Counsel for NVAHI has conferred with both parties, and both parties consent
19 to this motion.
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21 6. A copy of the proposed amicus brief is being submitted with this motion.
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CONCLUSION

For the foregoing reasons, proposed Amicus Curiae National Vote at Home Institute respectfully requests the Court grant the motion for leave to file the attached brief.

Respectfully submitted,

Dated: July 21, 2025

LAW OFFICE OF AMANDA BEANE, P.C.

By: /s/ Amanda Beane

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